



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

January 4, 2006

Sarah Brown, Treasurer
Ohio Republican Party State
Central & Executive Committee
211 S. Fifth Street
Columbus, OH 43215

Response Due Date:
February 6, 2006

Identification Number: C00162339

Reference: Amended October Monthly Report (9/1/05 – 9/30/05), received 11/11/05

Dear Ms. Brown:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-The totals listed on Lines 6(c), 7, 11(a)(i), 11(a)(iii), 11(d), 15, 19, 20, 21(c), 28(a), 28(d), 30(b), 30(c), 31, and 32, Column B of the Summary and Detailed Summary Page(s) appear to be incorrect. Please be advised that you should add the "Calendar Year-to-Date" total from your previous report to the current "Total This Period" figure from Column A to derive the correct Column B totals. Please amend your report and any subsequent reports that may be affected by this correction.

-The beginning cash balance of this report should equal the ending balance of your 2005 September Monthly Report (8/1/05 – 8/31/05). Please clarify this discrepancy and amend any subsequent report(s) that may be affected by this correction.

-The Detailed Summary Page, on Line 18(a) Column A of your 2005 Amended August Monthly (7/1/05 – 7/31/05), received 9/6/05, September Monthly (8/1/05 – 8/31/05), and Amended October Monthly (9/1/05 – 9/30/05), received 11/11/05, reports combined discloses \$186,000 in transfers from the non-federal account for allocated activity for the reporting period. However, Line 21 (a)(ii) Column A discloses

26038941989

\$173,309.08 as the non-federal share for allocated activity for the reporting period. While the non-federal account is permitted to transfer funds to the federal account for allocated activity, transfers for allocated activity must be made within a 70-day time period: no more than 10 days before or 60 days after the payment to the vendor. 11 CFR §§106.6(e)(2) and 106.7(f)(2) Please clarify the nature of the transfers-in from the non-federal account.

The Commission recommends that you immediately transfer back to the non-federal account, the total excessive amount which was received by your federal account outside the 70-day time period. Although the Commission may take further legal action concerning this prohibited activity, your prompt action will be taken into consideration.

-On Schedule H4, your allocated activity or event year-to-date total calculations for the Administrative category are incorrect. Allocated activity or event year-to-date totals for administrative, voter drive, exempt activity costs and expenses for public communications made by PACs referencing only political parties are derived by aggregating all disbursements during the calendar year for each separate category. Allocated activity or event year-to-date totals for fundraising and direct candidate support activities are derived by aggregating all disbursements during the calendar year within a specific event. These should be calculated by adding the latest disbursement for a category or event to the previous event year-to-date total for that category or event. This running event year-to-date total should be disclosed after each disbursement is listed. Please amend your report by providing the correct event year-to-date totals.

-Schedule B of your report discloses memo entries totaling \$555, which identify the original vendors of apparent charges made to credit card companies; however, Schedule B of your report discloses no payments associated with these memos. Please amend your report to clarify this apparent discrepancy.

-Schedule B, supporting Line 30(b), discloses memo entries totaling \$185, which appear to identify the original vendors of reimbursements. However, there are no reimbursements disclosed on Schedule B, supporting Line 30(b). Please amend your report to clarify this discrepancy.

-Schedule H4 of your report discloses a total of \$3,501.54 in payments made to apparent credit card companies; however, the sum of the memo

entries provided identifying the original vendors associated with these payments total \$339.92. Please amend your report to clarify this apparent discrepancy.

-Schedule H4 discloses reimbursements to individuals totaling \$2,315.80. However, the sum of the memo entries provided identifying the original vendors associated with these payments total \$1,559.15. Please amend your report to clarify this discrepancy.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. **Requests for extensions of time in which to respond will not be considered.** Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,



Laura E. Sinram

Campaign Finance Analyst
Reports Analysis Division

26038941991

26038941992